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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS & ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No.: 19-30088-DM

Chapter 11

**RESPONSE BY TODD GREENBERG TO
REORGANIZED DEBTORS' FORTIETH
OMNIBUS OBJECTION TO CLAIMS (NO
LIABILITY / PASSTHROUGH CLAIMS)**

Date: December 15, 2020

Time: 10:00 a.m.

Place: (Telephonic Appearances Only)
Courtroom 17

450 Golden Gate Avenue, 16th Floor
San Francisco, California

Judge: Hon. Dennis Montali

TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Creditor Todd Greenberg ("Greenberg") hereby opposes the omnibus objection by Reorganized Debtors with respect to Greenberg's Claim No. 77335 and seeks a hearing on the merits.

As indicated in the accompanying Declaration of Todd Greenberg, the property damage occurred between February 14 and February 21, 2016. Accordingly, the three-year statute of limitations for property damage, California Code of Civil Procedure section 338, had not lapsed at

1 the time that PG&E filed this case on January 29, 2019.

2 Claimant Todd Greenberg seeks recovery of damages under California Civil Code Section
3 3333 and other applicable statutes or principles of law for all detriment to him and his real and
4 personal property caused by the actions of PG&E.

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6 Dated: December 1, 2020

TRODELLA & LAPPING LLP

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8 By: /s/ Richard A. Lapping
Richard A. Lapping
9 Attorneys for Todd Greenberg
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